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t/a Prestige Window Fashions, Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
HONORABLE MICHAEL B. KAPLAN
CASE NO. 09-28689 (MBK)

In re:

BAMBOO ABBOTT, INC. t/a Prestige
Window Fashions,

Debtor-in-Possession.

Chapter 11

(Proposed) Bid Procedures Hearing: January 12, 2010 at 2:00 p.m.
(Proposed) Approval Hearing: January 21, 2010 at 2:00 p.m.
(Proposed) Sale Objection Deadline: January 20, 2010 at 4:00 p.m.

ORAL ARGUMENT REQUESTED

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER PURSUANT TO 11 U.S.C.
§§ 105(A), 363, 365 AND 1113 AND FED. R. BANKR. P. 2002, 6004 AND 6006: (1)
APPROVING "STALKING HORSE" ASSET PURCHASE AGREEMENT FOR THE
SALE OF SUBSTANTIALLY ALL OF THE DEBTOR'S ASSETS; (2) APPROVING
BIDDING PROCEDURES AND FORM, MANNER AND SUFFICIENCY OF
NOTICE; (3) SCHEDULING (A) AN AUCTION SALE AND (B) A HEARING TO
CONSIDER APPROVING THE HIGHEST AND BEST OFFER; (4) AUTHORIZING
THE DEBTOR TO SELL SUBSTANTIALLY ALL OF ITS ASSETS FREE AND
CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS AND TO
ASSUME AND ASSIGN CERTAIN RELATED EXECUTORY CONTRACTS,
UNEXPIRED LEASES AND ITS COLLECTIVE BARGAINING AGREEMENT; AND
(5) GRANTING OTHER RELATED RELIEF**

PLEASE TAKE NOTICE that on the date and time set forth in the Order Shortening
Time served herewith, the undersigned, attorneys for Bamboo Abbott, Inc. t/a Prestige Window
Fashions, the within debtor and debtor-in-possession (the "Debtor"), shall move before the

Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, with respect to the approval of bidding procedures, the granting of an expense reimbursement to the stalking horse bidder, the approval of the form and manner of sale notices, and the setting of a sale hearing date, as contemplated in the Debtor's motion (the "Motion") for an Order pursuant to 11 U.S.C. §§ 105(a), 363, 365 and 1113 and Fed. R. Bankr. P. 2002, 6004 and 6006: (1) Approving a "Stalking Horse" Asset Purchase Agreement for the Sale of Substantially All of the Debtor's Assets; (2) Approving Bidding Procedures and Form, Manner and Sufficiency of Notice Thereof; (3) Scheduling (a) an Auction Sale and (b) a Hearing to Consider Approving the Highest and Best Offer; (4) Authorizing the Debtor to Sell Substantially All of its Assets Free and Clear of Liens, Claims, Encumbrances, and Interests and to Assume and Assign Related Executory Contracts, Unexpired Leases and its Collective Bargaining Agreement; and (5) Granting Other Related Relief. Subsequently, the Debtor intends to move, on such date as is fixed by the Court in a Bidding Procedures Order (as defined in the Motion), for the relief requested in subparts (4) and (5) of the Motion.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Verified Application. A proposed form of Bidding Procedures Order also is submitted herewith.¹

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be presented in accordance with the Order Shortening Time served herewith.

¹ A form of the Approval Order (as defined in the Motion) will be filed by the Debtor in advance of the Approval Hearing (as defined in the Motion).

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on each return date set by the Court with respect to the Motion.

Respectfully submitted,

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.
Attorneys for Bamboo Abbott, Inc.
t/a Prestige Window Fashions, Debtor-in-Possession

By: /s/ Michael D. Sirota
Michael D. Sirota
David M. Bass

DATED: January 10, 2010